

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

ADDENDUM NO. 1 TO
CLEANUP AND ABATEMENT ORDER NO. 86-52
THRIFTY OIL COMPANY
SERVICE STATION NO. 118
SAN DIEGO COUNTY

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board), finds that:

1. On April 28, 1986, the Executive Officer issued Cleanup and Abatement Order No. 86-52 to Thrifty Oil Company in response to the accidental discharge of approximately 4,200 gallons of gasoline into the ground through a monitoring well at the Thrifty Service Station No. 118 on December 17, 1985.

2. Finding No. 11 of Order No. 86-52 is as follows:

"Thrifty Oil Company threatens to cause conditions of pollution, as defined in Finding 6 in waters of the state in accordance with the following rationale:

- a. Gasoline, injected into the tank backfill through the monitoring well, has created a petroleum hydrocarbon soil contamination zone at the Thrifty Service Station No. 118.
- b. The gasoline contaminated backfill and soil threatens to be a source of contamination, by infiltration and leaching, to the underlying ground water. The petroleum hydrocarbon ground water contamination plume thus created could likely contain constituents exceeding the levels listed in Finding 10.
- c. In the absence of effective remedial action by Thrifty Oil Company, the contamination plume could migrate to Tecolote Creek, thus the subsurface petroleum hydrocarbon contamination zone threatens to alter the water quality of Tecolote Creek to a degree which would affect the surface water beneficial uses listed in Finding 8."

3. The first paragraph of Directive No. 1 of Order No. 86-52 is as follows:

"Thrifty Oil Company shall submit a report to this office no later than May 30, 1986 identifying and developing a range of remedial action alternatives to clean up the petroleum hydrocarbon contamination resulting from the injection of gasoline into the tank backfill at the Thrifty Oil service station No. 118. The report shall

examine and determine the cost of cleanup alternatives capable of achieving each of the following final soil cleanup levels:"

4. Directive 5 of Order No.;. 86-52 is as follows:

"Thrifty Oil Company shall take whatever appropriate actions as may be necessary to monitor the underlying ground water for petroleum hydrocarbon contamination for the duration of the cleanup program. For instance, monitoring wells would serve this purpose."

5. In a May 13, 1986 meeting between Regional Board staff, County of San Diego Department of Health Services (DHS), Thrifty Oil Company and their consultants, the following issues were discussed:
- a. It was agreed by all parties that Thrifty Oil Company will employ, at least initially, a vapor extraction system to effect the cleanup of the petroleum hydrocarbon contamination caused by the unauthorized subsurface gasoline discharge.
 - b. Thrifty Oil Company questioned the accuracy of Findings 11(b) and (c). Thrifty Oil Company noted that since most of the area is covered with pavement, gravitational flow rather than infiltration and leaching, would be the only mechanism that could cause the petroleum hydrocarbon waste to reach the underlying ground water. Also, Thrifty Oil Company objects to the use of the word "likely" in Finding 11(b). This is because they maintain that the sorption capacity of the soil column above the ground water table is greater than the quantity of gasoline in the soil. Although the height of the soil column above the first water table is not known, Regional Board staff agrees that the word "likely" can be omitted. Finally, Thrifty Oil Company feels it is unrealistic to say that the gasoline contamination zone threatens to alter the water quality of Tecolote Creek which is approximately 1/2 mile from the Thrifty service station. Regional Board staff does not believe that enough information is available to rule out this potential effect of the gasoline contamination.

IT IS HEREBY ORDERED That Order No. 86-52 shall be modified as follows:

1. Finding No. 11 of Order No. 86-52 is changed to read as follows:

"Thrifty Oil Company threatens to degrade the quality of the state's waters, or cause conditions of pollution as defined in Finding 6 in waters of the state in accordance with the following rationale:

- a. Gasoline, injected into the tank backfill through the monitoring well, has created a petroleum hydrocarbon soil contamination zone at Thrifty service station no. 118.
 - b. The gasoline contaminated backfill and native soil threatens to be a source of contamination, by gravitational flow, or infiltration and leaching, to the underlying ground water. The petroleum hydrocarbon ground water contamination plume thus created might contain constituents exceeding the levels listed in Finding 10.
 - c. In the absence of effective remedial action by Thrifty Oil Company, the ground water contamination plume discussed in Finding 11(b) could migrate to Tecolote Creek and alter its water quality to a degree which could possibly affect the surface water beneficial uses listed in Finding 8."
2. The first paragraph of Directive 1 of Order No. 86-52 is changed to read as follows:

"Upon direction of the Executive Officer at some point in the future, before the hazardous substance spill site can be considered cleaned up to the Regional Board's satisfaction, Thrifty Oil Company shall submit a report to this office identifying and developing a range of remedial action alternatives to clean up the petroleum hydrocarbon contamination resulting from the injection of gasoline into the tank backfill at the Thrifty Oil service station No. 118. The report shall examine and determine the cost of cleanup alternatives capable of achieving each of the following final soil cleanup levels:"

3. Directive 5 of Order No. 86-52 is changed to read as follows:

"Thrifty Oil Company shall submit to the Regional Board office all monitoring or progress reports that are required by the DHS."

Ladin H. Delaney

Ladin H. Delaney
Executive Officer

Dated: June 3, 1986

